

EXHIBIT I

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	Jointly Administered
Debtors.	:	
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**OBJECTIONS AND RESPONSES OF DEBTORS TO
OCH-ZIFF CAPITAL MANAGEMENT GROUP LLC'S FIRST SET OF
INTERROGATORIES AND DOCUMENT REQUESTS DIRECTED TO DEBTORS**

Lehman Brothers Holdings, Inc., and its affiliated debtors in the above-referenced chapter 11 cases (collectively, the "Debtors"), by its undersigned attorneys, hereby objects and responds to Och-Ziff Capital Management Group LLC's ("Och-Ziff") First Set of Interrogatories and Document Requests Directed to Debtors, dated June 25, 2010 (hereinafter, the "Interrogatories and Document Requests"), as follows:

**GENERAL OBJECTIONS AND RESPONSES
TO INTERROGATORIES AND DOCUMENT REQUESTS**

1. The Debtors object to the Interrogatories and Document Requests on the ground that they are interposed solely for the purpose of harassment. Och-Ziff seeks to obtain discovery while simultaneously filing its *Memorandum of Law in Support of its Objections to Debtors' Subpoena Duces Tecum Dated April 10, 2010* (the "Motion to Quash"), in which Och-Ziff disputes the Debtors' legitimate right to obtain discovery from Och-Ziff pursuant to Federal Rule of Bankruptcy Procedure 2004 ("Rule 2004").¹ Och-Ziff is using the ruse of contesting the Debtors' court-authorized Rule 2004 discovery as a device to seek its own discovery without authorization (or cause) to do so under Rule 2004 or in connection with any pending adversary proceeding. Such cynical sword and shield tactics are improper.

2. The Interrogatories and Document Requests seek to require Debtors to divulge information and documents on topics that are beyond the scope of any discovery that has been ordered or is presently permitted in these Cases.

3. There is no legitimate basis for Och-Ziff to conduct discovery with respect to the basis upon which the Debtors have sought Rule 2004 discovery of Och-Ziff. The Debtors have met and conferred with counsel for Och-Ziff numerous times during which they explained their basis for seeking such exploratory discovery. Furthermore, the Debtors will file their response to the Motion to Quash, wherein Debtors will explain (again) their basis for seeking Rule 2004 discovery of Och-Ziff. No factual discovery of the Debtors is required.

4. To the extent the Interrogatories and Document Requests seek information concerning Kasowitz, Benson, Torres & Friedman, LLP's representation of the Debtors they

¹ In addition to the Interrogatories and Document Requests, Och-Ziff has also sought to depose a witness for the Debtors who has knowledge of the basis of the Rule 2004 discovery. *See Och-Ziff's Notice of Deposition to Debtors*, dated June 2, 2010. The Debtors have objected to this Notice of Deposition on similar grounds.

require the Debtors to provide testimony that is protected from discovery by the attorney-client privilege and the attorney work-product doctrine.

5. The Interrogatories and Document Requests are premature. Should Debtors commence an adversary or other proceeding against Och-Ziff, Och-Ziff will have a full opportunity to conduct its own discovery of Debtors. Och-Ziff is not entitled to discovery of the Debtors with respect to the basis of claims that have not yet been asserted by the Debtors and conceivably may not be.

6. Because the Debtors object to the Interrogatories and Document Requests in their entirety, the Debtors have not set forth specific objections and reserve the right to do so in the event their Objections and Responses should be overruled. The Debtors reserve the right to supplement or amend their Objections and Responses to the Interrogatories and Document Requests consistent with applicable procedural rules.

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

Interrogatory No. 1: Identify each person who was consulted in connection with or participated in the preparation of the answers to these Interrogatories.

Objection and Response:

Because the Debtors object to the Interrogatories and Document Requests in their entirety, the Debtors have not set forth specific objections and reserve the right to do so in the event their Objections and Responses should be overruled. The Debtors reserve the right to supplement or amend their Objections and Responses to the Interrogatories and Document Requests consistent with applicable procedural rules.

Interrogatory No. 2: Identify each person who identified Och-Ziff as a “source of information” as represented by Michael Bowe, Esq. on May 26, 2010 as justification for taking Rule 2004 discovery of Och-Ziff.

Objection and Response:

Because the Debtors object to the Interrogatories and Document Requests in their entirety, the Debtors have not set forth specific objections and reserve the right to do so in the event their Objections and Responses should be overruled. The Debtors reserve the right to supplement or amend their Objections and Responses to the Interrogatories and Document Requests consistent with applicable procedural rules.

Interrogatory No. 3: Identify all documents concerning or identifying Och-Ziff as a “source of information” about Lehman during the Relevant Period.

Objection and Response:

Because the Debtors object to the Interrogatories and Document Requests in their entirety, the Debtors have not set forth specific objections and reserve the right to do so in the event their Objections and Responses should be overruled. The Debtors reserve the right to supplement or amend their Objections and Responses to the Interrogatories and Document Requests consistent with applicable procedural rules.

SPECIFIC RESPONSES AND OBJECTIONS TO DOCUMENT REQUESTS

Document Request No. 1: Produce all documents identified in response to the above Interrogatories.

Objection and Response:

Because the Debtors object to the Interrogatories and Document Requests in their entirety, the Debtors have not set forth specific objections and reserve the right to do so in the event their Objections and Responses should be overruled. The Debtors reserve the right to

supplement or amend their Objections and Responses to the Interrogatories and Document
Requests consistent with applicable procedural rules.

Dated: New York, New York
July 28, 2010

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